

Founded 1891

January 22, 2014

Environmental Management Support, Inc.

Attn: Mr. Don West

8601 Georgia Avenue, Suite 500

Silver Spring, MD 20910 Phone: (301) 589-5318

Re: Barberton, Ohio: U.S. EPA Brownfields Assessment Grant Application

Dear Mr. West:

The City of Barberton is submitting the enclosed application for the community-wide assessment grant in the amount of \$400,000 (requesting \$200,000 for hazardous substances assessment and \$200,000 for petroleum substances assessment).

The Assessment grant will allow the City of Barberton to address the threats brownfields pose to the health and welfare of its residents and natural resources; restore properties to productive, job-creating, tax-generating uses; and protect agricultural, open space, waterways, and green space in the City.

The City of Barberton (population 26,550) is located in northeastern Ohio, along the Interstate 76 corridor in Summit County, Ohio, less than 10 miles southwest of Akron. Since Barberton's founding, industry has played a vital role in the community. Founding companies like the Diamond Match Company, Columbia Chemical Company (eventually purchased by Pittsburgh Plate Glass), Stirling Boiler Company (which later merged with Babcock & Wilcox), Pittsburgh Valve and Fittings, and the American Sewer Pipe Company provided good pay and opportunity for workers and their families. These were followed by numerous rubber manufacturers, such as Rubber Products Company, Portage Rubber Company, and Electric Rubber Reclaiming Company, an effect of our proximity to Akron. Most of these facilities were surrounded by the residential neighborhoods that provided their workforces. Many were located near the City's major waterway, the Tuscarawas River, part of the Ohio and Erie Canal, a system of waterways providing a direct shipping route to Lake Erie and the Ohio. Between December 2006 and August 2012 the City lost 4,982 jobs according to the United States Department of Labor (www.beta.bls.gov). Lost tax revenue and rising poverty rates accompanied the job loss. This impacted many families who relied on skilled manufacturing jobs for financial survival and replacement jobs are often lower paying service sector jobs. According to the 2010 ACS, Barberton had over 5,400 individuals (20.6%) and over 1,200 families (18.0%) living in poverty. These rates have increased by more than 50% since the 2000 Census. The 2010 annual per capita income was only \$18,585, median household income was \$35,411 and 22.2% of households earned less than \$15,000. According to the U.S. Bureau of Labor Statistics, unemployment was 11.6% in 2010.

The dire economic conditions leave no money for brownfields, yet redevelopment of these sites hold the promise of helping to revitalize the City's economy by attracting new businesses and jobs. The major goals of the City's Comprehensive Plan include: 1) to maintain and improve the success and viability of

Barberton's downtown core, recognizing that the core is the emotional and practical heart of the city; and 2) improve the viability of the City's economic base to encourage appropriate, quality redevelopment and development. The City sees redeveloping its brownfields as an essential step in achieving these goals.

Barberton is a past recipient of U.S. EPA Brownfield Grants, including an Assessment Demonstration Pilot (1999), a Site-Specific Hazardous Assessment Grant (2004; BP96556901) a Community-Wide Hazardous and Petroleum Assessment Grant (2007; BF00E33501), and a recent ARRA cleanup grant (2009). The City of Barberton has benefited from successful completion of multiple Phase I and II Environmental Site Assessments under its previous U.S. EPA grants. These funds have made possible the acquisition of a former rubber manufacturing facility, remediation of a former Sunoco facility, and the redevelopment of a former industrial arts complex into our thriving 56,000 square-foot Lake Anna YMCA Community Center.

The City will use the Assessment grant to incentivize redevelopment of brownfields that are impacting the health and welfare of residents and degrading the quality of the City's waterways. The brownfield redevelopment will reuse existing infrastructure, reduce urban sprawl, promote sustainable building practices and resources management, as well as create additional green space.

The following information was requested as part of the Grant Application:

a. Applicant Identification: City of Barberton, 576 West Park Avenue, Barberton, Ohio 44203

b. Applicant DUNS Number: 34-6000188

c. Funding Requested:

i. Grant Type: Assessment

ii. Funds Requested: \$400,000 (\$200,000 each for petroleum and hazardous)

iii. Contamination: Both hazardous substances and petroleum

iv. Community-wide

d. Location: Barberton, Ohio

e. Property Name and Address: Not applicable (community-wide assessment).

f. Project Director: Mr. Joe Stefan, Interim Planning Director, 576 West Park Avenue, Barberton, OH 44023.

Phone: 330-848-6729 Fax: 330-846-6649; Email: jstefan@cityofbarberton.com

Chief Executive: Mr. William B. Judge, Mayor, 576 West Park Avenue, Barberton, OH 44023,

Phone: 330-848-6719; Fax: 330-848-6663; Email: wjudge@cityofelyria.org

g. Date Submitted: January 22, 2014

h. Project Period:

Estimated October 1, 2014 through September 30, 2017 (not to exceed 3 years)

i. Population:

City of Barberton: 26,550 (Ref: 2010 U.S. Census)

j. Other Factors:

The grant targets sites impacted by controlled substances, includes impacted areas of recent natural disasters, primarily focuses on Phase II assessment, demonstrates firm leveraging commitments, and impacts areas of economic disruption due to auto

plant closures, and areas of economic disruption resulting in job loss

Sincerely,

Mayor

Interim Planning Director

#### City of Barberton 2014 Assessment Grant - V.B. Ranking Criteria for Assessment Grants

#### 1. Community Need

#### a. Targeted Community and Brownfields

i. Targeted Community Description. With approximately 26,550 residents (2010 Census), Barberton is an urban, blue-collar community located along the Interstate 76 corridor, less than 10 miles southwest of Akron in Summit County, Ohio. Founded in 1891 by the entrepreneur and philanthropist Ohio Columbus (O.C.) Barber, known as the "Match King" because of his controlling interest in the Diamond Match Company, the village of Barberton was sited because of its access to the Ohio & Erie Canal system, as well as numerous rail lines. Since Barberton's founding, industry has played a vital role in the traditions and history of our community. Founding companies, like the Diamond Match Company, Columbia Chemical Company (eventually purchased by Pittsburgh Plate Glass), Stirling Boiler Company (which later merged with Babcock & Wilcox), Pittsburgh Valve and Fittings, and the American Sewer Pipe Company, provided good pay and opportunity for workers and their families. By 1906, Barberton boasted the largest match, soda ash, boiler, valve, and sewer pipe factories in the United States. These were soon joined by numerous rubber manufacturers, such as Rubber Products Company, Portage Rubber Company, and Electric Rubber Reclaiming Company, an effect of our proximity to Akron. Barberton was a thriving community, attracting waves of immigrants from eastern and southern Europe, and became a City by proclamation in January 1911. Barberton is now a typical "Rust Belt" city with many potential brownfield sites. Historic manufacturing, defense contracting, rubber, iron and steel industries have left the city with vast tracts of contaminated land, decaying public infrastructure, a depleted tax base and high unemployment. Former industrial sites lining the Tuscarawas River and the canals are a blighting influence on the community, both aesthetically and environmentally. Smaller steel fabrication and welding companies, automotive salvage yards, repair shops and service stations were shut down and abandoned, leaving a legacy of perceived contamination throughout our City and our watersheds. Through previous planning and inventorying activities, the City has estimated that brownfields cover 16.6% of Barberton's nine square miles of land area. Priority sites in Barberton include the Downtown and Tuscarawas River/Canal corridors, per the City's Master Plan (2006).

#### ii. Demographic Information

Table 1. Demographic Information						
	5101	5103.01	Barberton,	Summit	Ohio	
	(Downtown)	(Center/River)	OH	County, OH	Statewide	National
Population (1)	3,131	4,866	26,550	541,781	11,536,504	308,745,538
Unemployment (2012) (2)	14.6%	5.9%	8.0%	6.8%	7.2%	8.1%
Poverty Rate (3)	33.1%	34.4%	19.1%	15.7%	16.1%	15.7%
Percent Minority (1)	8.0%	19.4%	9.2%	19.4%	17.3%	27.6%
Median Household Income (3)	\$28,214	\$29,231	\$36,184	\$48,252	\$47,030	\$55,771
Percent Hispanic (1)	0.5%	6.6%	1.4%	1.6%	3.1%	16.3
Percent Elderly (>65) (1)	9.1%	18.8%	16.5%	6.0%	14.1%	13%
Percent Children (<18)(1)	27.3%	25.7%	23.5%	63.3%	23.7%	24.0%

<sup>(1)</sup> Data is from the 2010 U.S. Census data and is available at http://www.census.gov/.

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<sup>(2)</sup> Data is from the Bureau of Labor Statistics and is available at www.bls.gov.

<sup>(3)</sup> Data is from the 2010-2012 American Community Survey 3-Year Estimates and is available at <a href="http://factfinder2.census.gov">http://factfinder2.census.gov</a> Note: All data from census tracts is from the 2008-2012 American Community Survey 5-Year Estimates and is available at <a href="http://factfinder2.census.gov">http://factfinder2.census.gov</a>

iii. Brownfields. Sites in the Downtown and Center River Corridors (Census tracts 5101 and 5103) pose a direct health threat due to their proximity to the Tuscarawas River and are priorities based on potential impacts to groundwater and location relative to the City's most sensitive and impoverished residents. The nature and extent of the City's brownfields, past land uses and site activities, potential environmental contaminants and current conditions are addressed on potential properties in table 2.

				lect Targeted Brownfield Sites	
Brownfield Site/Location	Past Land Uses and Site Activities/Current Conditions	Potential Contaminants	Potential Exposure Pathways	Proximity to Potential Receptors	Health Effects
Vacant gas stations (various)	Closed gas stations/vacant	Benzene, toluene, ethylbenzene, xylenes (BTEXT), Methyl Tertiary Butyl Ether (MTBE), waste oils, diesel	Direct contact, migration to groundwater, inhalation	Daycares, schools, public parks throughout the City	Asthma, cancer, central nervous system (CNS) and immunity problems
Former Sun Rubber property (Downtown Census Tract)	Rubber manufacturing complex/vacant	Chlorinated solvents, Polycyclic aromatic hydrocarbons (PAHs), organic vulcanizers, pigments, resins, otoluidine, aniline	Direct contact, airborne particulates, and inhalation	Immediately adjacent to Tuscarawas River, residential is across the street to the East	Respiratory, CNS problems, bladder cancer, stomach cancer, lung cancer, heart, blood, liver, skin, eyes
Former Sieberling Rubber Company (20 acres) 345 15th Street NW (Center River Tract)	Rubber manufacturing complex/15% in use and the remainder is vacant	Chlorinated solvents, PAHs, organic vulcanizers, pigments, resins, toluidine, aniline	Direct contact, airborne particulates, and inhalation	Surrounded by residential, immediately adjacent to the West of Wolf Creek and Decker Park 5 schools, 4 daycares, and 3 public parks located within one mile	Respiratory, CNS problems, bladder cancer, stomach cancer, lung cancer, heart, blood, liver, skin, eyes
Former Rockwell Manufacturing Co. (40 acres) 401 Newell St. (Downtown Census Tract)	Iron and brass foundry, metal casting and machining/vacant	Chlorinated solvents, BTEX, PAHs, heavy metals	Direct contact, migration to groundwater, inhalation	Immediately adjacent is new Middle School and High School and surrounded by residential to the North and East and South, 6 schools, 3 daycares, and 4 public parks within one mile	Asthma, cancer, CNS, immunity deficiency
290 Wooster Rd. N (former meth lab) <sup>(1)</sup>	illegal meth operation	Controlled substances, solvents, chemicals	Direct contact, inhalation	Within Tuscarawas River corridor; health center within 0.2 miles	Respiratory problems, CNS, heart, blood, liver

The overriding concerns of these potential contaminants reaching the targeted community are two-fold: (1) the concentration of brownfields in the downtown area, which coincides with the City's poorest and most sensitive populations (as discussed in Section 1.b); and (2) the extent of brownfields located next to the Tuscarawas River. Many of these sites are located in close proximity to residential areas, parks, schools, etc. For instance, the Former Sieberling Rubber Company is located less than one mile from five schools, four daycares, and three public parks. According to http://www.ehso.com/contaminants.htm, common contaminants at industrial properties are perceived threats to public health and the environment and public health through human exposure to the contaminants via direct contact, airborne particulates and vapor intrusion.

iv. Cumulative Environmental Issues. In 2012, Scorecard.org ranked Summit County among the dirtiest/worst 10% of all counties in the U.S. for ozone depleting potential and air releases of recognized developmental toxicants. It was also ranked among the dirtiest/worst 30% of all counties in the U.S. in terms of total environmental releases, cancer and non-cancer risk from air and water releases, air releases of recognized carcinogens, and air releases of recognized reproductive toxicants. In 1999, it was ranked among the dirtiest/worst 10% of all counties in the U.S. in terms of carbon monoxide, nitrogen oxides, PM-2.5, sulfur dioxide, and volatile organic compound emissions and cancer and noncancer risks from hazardous air pollutants (all references from www.scorecard.org). On July 11, 2013 Barberton experienced significant flash flooding (http://www.19actionnews.com/story/22810499/severe-flash-flooding-in-barberton). Summit County was declared a State of Emergency as waters rose nearly 3 feet in some portions of the City.

#### b. Impacts on Targeted Community

Real and perceived negative impacts of the brownfields include their contaminants, many of which are suspected or known carcinogens and are known to cause respiratory disease, neurological damage, kidney damage, reproductive system damage, and birth defects. The health effects on our community from decades of industrial pollution and lingering brownfields sites may already be evident. In Summit County, there is an increased risk of several types of diseases as compared to the State of Ohio. Based on the age-adjusted incidence rates of various types of cancer from 2005, as provided by the Ohio Department of Health, there is a 13% greater risk of Hodgkins lymphoma, an 18% greater risk of bladder cancer, a 23% greater risk of testicular cancer and a 29% greater risk of liver cancer. Summit County also has a higher incidence of deaths from chronic respiratory disease, pneumonia and influenza as compared to the state averages. In addition, based on 2006 data provided by the Ohio Department of Health, the prevalence of current and lifetime asthma in Summit County adults is 9.4% and 11.5%, respectively.

Barberton's major water resource is the Tuscarawas River, which transects the City diagonally from northeast to southwest. The Barberton Reservoir, located in the Tuscarawas watershed, is the primary drinking water source for the City. Groundwater is an additional major water source, which is directly influenced by the Tuscarawas River. Several large brownfields, such as vacant gas stations and former industries, are located directly adjacent to the Tuscarawas River, thus impacts to the river are likely. By their nature, surface waters are accessible and can be readily contaminated by chemicals and pathogens, with relatively short travel time from source to intake. Barberton's drinking water source protection area is susceptible to contamination from municipal wastewater discharges, air contamination deposition, runoff from residential and urban areas, oil and gas production, leaking underground storage tanks and accidental releases and spills from rail and vehicular traffic, commercial shipping and recreational boating. In addition, due to the proximity of brownfields along the Tuscarawas River, migration of contaminants to surface and groundwater poses a serious threat to the ecosystems of the Tuscarawas River watershed, as well as the residents and visitors who utilize the river for recreation.

Census data (Table 1) for Barberton show a larger percentage of children, minorities, women of child-bearing age, single female householders, and impoverished persons within the City's urban core, than in the County or State. The prevalence of reported asthma in children is 14.9%, with over 14,200 children living with asthma in 2006. The Ohio Family Health Survey (2008) reports that 16.7% of children in Summit County have been diagnosed with asthma. It could be argued that the higher incidence of these types of diseases in Summit County could be due to exposure to carcinogens or compounds that exacerbate respiratory conditions stemming from the long history of industrial activity and associated pollution centered in Barberton, Akron, and other areas in Summit County. The concentration of brownfields in the City shows that these sensitive populations suffer disproportional exposure risks. Census tracts 5101 and 5103.01 contain significantly greater percentages of children under 18, minority populations and/or persons living below the poverty line as compared to Summit County and the City overall. These tracts are located with the target areas for the City of Barberton's Master Plan (2006). In Census Tract 5101, 39.5% of households are headed by a single female with 68.1% living in poverty. Other sensitive population concerns include the proximity of brownfields to schools, daycare centers, parks, hospitals/clinics, and assisted living facilities. For example, there are six schools, three daycares, and four public parks within one mile of the former Rockwell Manufacturing Company property.

#### c. Financial Need

i. Economic Conditions. The City of Barberton needs the U.S EPA funding to conduct studies needed as prerequisites for redevelopment on several properties. The City does not have other sources of funding to draw upon due to the difficult budget situations facing the City in the near future. Income tax, the City's largest source of operating revenue, has continued to remain stagnant while operating costs are starting to increase due to inflationary pressures, unmet capital needs and the raising costs of employee benefits. Operating costs, such as fuel and health care, continue to be a burden and capital replacement needs are ongoing. Barberton's average annual unemployment rate during 2012 was 8.0 percent, compared to 6.8 percent for Summit County and 7.2 percent for the State of Ohio. According to the City's 2012 financial summary, on a full accrual basis, the City received \$9,913,010 in income tax collections, or 47.82% of the total governmental revenues in 2012, compared to \$12,086,007 in income tax collections received in 2011. The 18% decrease in revenue is a result of significantly higher income tax refunds issued in 2012. Despite the City's cost cutting efforts over the last two years, balancing the budget for the foreseeable future will continue to be difficult. Other revenues such as shared support from the State are estimated to decline while certain operating costs such as fuel continue to increase. Capital replacement continues to be difficult as federal and state grants are reduced or eliminated. As an alternative, the City has pursued and been awarded several no or low-interest loans to assist in improving and maintaining its

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infrastructure. It is anticipated that further cost containment efforts, service reductions, and/or revenue enhancement actions may be necessary through the remainder of 2013 and into 2014 and beyond.

ii. Economic Effects of Brownfields. The presence of unused brownfields in the City has significant negative economic impacts on the City. From 1970 to 1983, many of the companies whose properties are targeted as potential sites, including Sun Rubber, Seiberling, and Rockwell, cut their work forces in half, resulting in the devastating loss of over 10,000 jobs. The closing of Sieberling Rubber alone in 1980 resulted in a loss of 1,000 jobs. In short, our economy has never recovered. In Ohio. 262,383 manufacturing jobs were lost between 2001 and 2010, according to the Ohio Department of Job and Family Services. The impact of these many company closings, job losses, and decreased personal income has a ripple effect from residents to businesses to ever-tightening municipal budgets. According to the 2010-2012 American Community Survey (ACS, http://factfinder2.census.gov), Barberton had over 5,050 individuals (19.1%) and over 970 families (14.6%) including almost half of the families with single female householders (39.0%) living below the poverty level. The average annual per capita income in the City was only \$18,482, the median household income was \$36,184 and 13.3% of households earned less than \$15,000. While the City-wide demographic statistics may not indicate a serious problem, the statistics in the certain distressed areas of the City's Downtown and River Corridor show that brownfields have indeed adversely impacted our community (Barberton Census Tracts 5101 and 5103.01, Table 1). The poverty rates in these neighborhoods, ranging from 33.1% to 34.4% for individuals and 29.5% to 31.1% for families, are significantly higher than the City's rates 19.7% and 16.2% (Note: Data is from the 2008-2012 American Community Survey 5-Year Estimates and is available at http://factfinder2.census.gov). Moreover, per capita and median household income are significantly lower in these areas as compared to the City overall and the County. Census data also illustrate the strong presence of single female householders in these areas living in poverty. Economic disinvestment and creation of brownfields has had significant negative impacts in these areas of the City, where many of our targeted brownfield sites are located. Assessment, cleanup and redevelopment of these sites are direly needed to generate new economic investment in our distressed areas.

According to the U.S. Department of Labor and Statistics, the City of Barberton has had significant economic disruption that has occurred within the community, resulting in a significant percentage of job loss. In the period between 2008 and 2013, the City had employment fluctuate from a high of 12,699 (July 2008) to low of 11,443 (January 2010), so a total disruption of 1,256 jobs. <a href="http://beta.bls.gov/dataViewer/view/timeseries/LAUCT39040005">http://beta.bls.gov/dataViewer/view/timeseries/LAUCT39040005</a>. While some of this job attrition can be attributed to automotive supply through Rockwell, B&C Machine and Sun Rubber, several major employers, including non-automotive suppliers such as Babcock and Wilcox and PPG also had significant layoffs. Job loss specific to automotive, included B&C Machine Company (now the former Seiberling rubber property listed in Table 2). B&C shut its doors and terminated all 123 employees on 7/27/09. According to a notice filed with the State of Ohio, the company's bank declared B&C in default and demanded full payment on its outstanding credit lines on July 17, 2009. B&C specialized in the manufacture, heat treatment, finishing and assembly of precision-machined components for the automotive, heavy truck, railroad, motorcycle and appliance industries, according to its website.

These job losses deeply impacted the City. According to the Department of Housing and Urban Development (2012), the City is considered 55% low to moderate income. Barberton is a Community Development Block Grant (CDBG) Entitlement Community because of its distressed nature and is included in the Ohio Department of Development's Priority Investment Area as a Labor Surplus City. The low income levels exhibited in many of parts of our community greatly reduces our ability to attract retail businesses, restaurants and hotels. This in turn makes the area less desirable to other employers.

According to the Akron Metropolitan Housing Authority (AMHA), the City has more than 1,100 residents living in 827 public housing units. Only 64% of Barberton's housing stock is owner occupied and nearly 10% of housing units are vacant (2012 ACS). Over 70% of the City's housing stock was developed prior to 1970 (2010 ACS). The age and condition of our housing limits our ability to attract executives to live in Barberton. According to the 2012 financial report, Barberton's assessed real property values have decreased approximately \$4.9 million, or about 1.4 percent since 2003. Real property values increased annually through 2008; however, since 2008 the assessed values have declined approximately \$55.4 million or 14%. The latest reappraisal occurred in 2012 and resulted in a decrease in real property values of approximately \$48.1 million or 12%. The current economic conditions have resulted in lower incomes, increased poverty, job losses, and reduced tax revenues and municipal budgets. These economic conditions drain local resources, leaving nothing left to address brownfields. Our situation is further complicated by our significant disadvantages in attracting high-paying employers, as compared with neighboring cities in northeast Ohio, such as Cleveland. Companies are interested in large sites, and are interested in properties that are ready to build or for which there are significant economic incentives available. In the City's Master Plan, there is focus on infill development on brownfield properties. The City has

received some developer interest for these sites; however, in light of the current economic trends and potential contamination issues at these properties, assessment funding is direly needed to incentivize redevelopment.

#### 2. Project Description and Feasibility of Success

### a. Project Description

i. Description. The City of Barberton will use the Community-wide Assessment Grant to incentivize brownfields redevelopment in struggling neighborhoods in the downtown core and along the Tuscarawas River/Canal. The brownfields program approach is directed by the goals of the City's Master Plan (located online at http://www.cityofbarberton.com). Rather than to continue to watch economy and quality of life decline, residents of Barberton decided to create a new strategy and vision for the City. The product of their input was a community-driven vision, the Barberton Master Plan (2006). The overall goals of the plan are to: 1) promote Barberton's strengths and enhance the City's identity in the region; 2) maintain and improve the success and viability of Barberton's downtown core, recognizing that the core is the emotional and practical heart of the city; 3) improve the viability of the city's economic base to encourage appropriate, quality redevelopment and development; and 4) encourage appropriate redevelopment in key locations throughout the city that enhances and complements the character of the city. Assessment, remediation and redevelopment of brownfields are necessary steps to achieve those goals. Members of the planning group identified target areas within the Downtown Corridor and the Tuscarawas River/Canal Corridor. Upon selection, the City will direct its environmental consultant to research local and Federal databases to ensure the properties are eligible.

The grant funded assessment work will be a catalyst for redevelopment strategy in Barberton. Our program will begin with assessing the priority brownfields in the areas targeted by the Plan in concert with other community-identified sites. Previous inventories of properties will be updated including priority on sites listed in this application. We will focusing on evaluating threats to sensitive populations and ecosystems and supporting redevelopment, and, second, providing support for area businesses or developers who plan to purchase and redevelop smaller sites located throughout the City (typical due diligence). This approach may be revised as the project progresses if intended outputs/outcomes are not being achieved and/or community concerns arise. Assessment data will be used to determine the extent of contamination; evaluate exposure pathways and develop mitigation/remediation strategies that are protective of human health and the environment; and support redevelopment planning and marketing of brownfields. As the grant project progresses, the City will integrate high-risk and developable sites identified by the community members and community organizations into the project and utilize grant funds to assess these sites. The City will assess a minimum of six sites using the Assessment Grant funds. Other sites will be assessed as business/developer interest occurs during the grant project. These assessments will support smaller commercial/industrial redevelopments in areas with existing infrastructure, creating local jobs and amenities without infringing on greenspace. The list below reflects properties that were prioritized based on the goals of the Master Plan. In addition to these sites, the City will solicit the opinion of the general public and the Brownfield Advisory Committee (see Section 3) in order to identify and prioritize sites.

Table 3. Key ⊺ar	geted Brownfield Properties, Planned Activities and Alignment with Comprehensive Plan
Site/Location	Planned Redevelopment Potential/Planning
Former Sieberling Rubber Company (20 acres) - 345 15 <sup>th</sup> Street NW	The site is partially occupied, but underutilized; remediation and redevelopment may provide for mixed use commercial and office space, as well as light manufacturing or warehousing. The Seiberling Building is comprised of 335,520 +/- SF of manufacturing /distribution space on five levels and a 51,296 SF +/- three story office building. BCDC and BLIC have invested \$951,260.85 to date which includes the purchase price and warehouse improvements, including repairs to the rail spur and tower. The majority of repairs and maintenance have been spent on the warehouse/distribution areas. Currently, 300,000+ SF of this area is being rented. Additional funding is needed toward renovations / improvements to the office building portion. Improvements include new HVAC, electric service, roofing, windows, ventilation system, lighting and fixtures, plumbing, drywall, carpet/flooring and sprinkling system if required. Total cost for office renovations/ improvements is ~\$3,000,000.
Former Sun Rubber property	Once remediated, this site would be best utilized as a multi-user complex for companies in need of rail.
Former Rockwell Manufacturing Co. (40 acres) -401 Newell St.	This property, once remediated, would need major renovations to the existing 15,328 SF building but could address mixed used commercial and retail or office space to access local High School traffic immediately adjacent to the property. In addition, several 10,000 to 15,000 SF, buildings could be built on the 20 acres. Majority of building inquiries we receive are for 10,000 to 15,000 SF.

In 1985, key business stakeholders and government leaders created the Barberton Community Development Corporation (BCDC). The BCDC today functions through a Board of Directors of 20 stakeholders and city members, including the Mayor of Barberton. It has facilitated the creation of over 2000 jobs and in excess of \$100 million in business expansion projects (source: BCDC). They have stimulated the creation of three mini-industrial parks, and 25 new construction projects. The BCDC was originally funded through federal funds and donations of real estate by the Babcock and Wilcox Company. With the creation of the Barberton Community Foundation in the late 1990s, the BCDC entered into a new level. It invested a portion of the Foundation's assets in prime credit business expansion projects. The City and BCDC will work with other community-based organizations (listed in Section 3) to determine property eligibility, prioritize eligible sites, and plan assessment activities. Sites will be selected based on the following criteria: (1) eligibility for assessment based on U.S. EPA requirements; (2) property location and cohesion with existing planning efforts such as the Comprehensive Master Plan; (3) willingness of property owners to partner with the City and provide access; (4) marketability of the site; (5) extent/perception of contamination hindering development; and (6) potential positive impact on the surrounding community. Upon property selection, the City, with assistance from an environmental consultant, will conduct research of local and Federal databases to ensure the selected properties are eligible for inclusion, not listed on the National Priorities List (NPL), have no unilateral administrative orders or court orders, nor are subject to jurisdiction, custody, or control of the U.S. government. The end result of the proposed project envisioned by the City of Barberton is the completion of approximately 8-14 Phase I Property Assessments, 4-6 Phase II Property Assessments, and associated plans, reports, and community outreach activities

ii. Project Management Approach. The City of Barberton and a qualified environmental consultant (the project team) will lead the brownfields program (2.c.i). The Planning Director will lead the grant management and work to best utilize grant funds and leverage additional funding sources to promote viable revitalization. The Planning Director will be responsible for the day-to-day grant operations including: updating and maintaining the brownfields inventory; distributing information about the project to the community; submittal of required reports to the EPA, and managing the brown field program information. The City will be responsible for procuring all contractual services, selecting sites for assessment; and tracking project progress toward redevelopment. After being awarded the Assessment Grant, the City will prepare a Work Plan with community support and secure approval from the EPA, marking the official start of the project. The City will then provide a notice to the public via legal public notice of a Request for Qualifications, obtain qualifications, and engage with a qualified environmental consultant. The consultant will begin to assist the project team in the completion of the site inventory, and qualifying sites as eligible for participation in the program through the appropriate hazardous substance or petroleum tract, or both, as appropriate. The consultant will author a Quality Assurance Project Plan to govern the implementation of the assessment in compliance with U.S. EPA protocols. Meetings will begin with property owners inviting the opportunity to participate, and a draft legal access agreement will be provided to potential participants of privately-owned properties that may qualify. The City of Barberton, its environmental consultant partner, and community organizations identified (Section 3.c.) will be involved in the inventory task, which will continue throughout the grant project period. Once a site is deemed eligible by the EPA, the community will be notified and the site will be assessed through performance of a Phase I Environmental Site Assessment (ESA) and/or a Phase II ESA Site Assessment procedures. Work for Phase II Assessment will be completed under an approved Quality Assurance Project Plan (QAPP) to ensure that the community is protected from contaminants during invasive assessment work. Upon receipt of assessment results, the environmental consultant will work with the City, potential developer, and partners to devise liability management, cleanup, and site use strategies that support redevelopment efforts and improve the health of residents and the environment. An anticipated schedule of completion for grant tasks/activities is as follows: 1) Prioritization/Update of Site Criteria (Redevelopment Planning), 2-4 weeks; 2) Quality Assurance Project Plan (QAPP) 4-6 weeks; 3) Site Specific Eligibility Analyses, 1 week; 4) Site Specific Access Agreement 1 week; 5) Phase I Property Assessment, 6-10 weeks; 6) Site Specific Sampling and Analysis Plan & Site Health and Safety Plan, 3-4 weeks; 7) Phase II Assessment, 8-12 weeks (contingent upon size/complexity of site; if groundwater is a pathway, may need seasonal samples that would extend timeframes to completion.); 8) Analysis of Brownfield Cleanup Alternatives (ABCA) or Ohio VAP Remedial Action Plan (RAP) 4-6 weeks: 9) Cleanup and Reuse Planning Meetings, 1-3 weeks for planning, public notice and implementation; and 10) Public and Private Engagement Meetings; 1-3 weeks for planning, public notice and implementation.

After completion of initial assessment activities, additional safe use or remedial investigations may be needed to further define the extent of contamination and design environmental response actions for cleanup and safe future use of the sites. Contaminated sites may be entered into the Ohio EPA Voluntary Action Program (VAP). The results of assessments will be disseminated to the community through public meetings and notification of community organizations. If health threats are identified, the Ohio EPA and the Barberton City-Summit County Health Department will be notified. If needed, the City will seek additional funding from local and state sources and/or the EPA for assessment activities and subsequent environmental response activities. The City will complete all activities on multiple properties within the required 3 years.

iii. Site Selection. While properties have been targeted for the purposes of identification in this application, the City understands that participation from private landholders is voluntary and that public outreach of the program will be an essential step in building partnerships and comfort with the assessment process. The sites listed in this application represent some, but not all of the potential properties that may be eligible to participate in the U.S. EPA Program. EPA funds could help to address the key areas raised by community interest. Members of the Barberton Master Plan (2006) steering committee, through public meetings. identified sensitive and target areas within the Downtown Corridor and Tuscarawas River/Canal corridor. All eliqible properties will be considered. Upon selection, the City will direct its environmental consultant to research local and Federal databases to ensure the properties are eligible. The end result of the City's proposed project will be the completion of up to 11 Phase I Property Assessments (PAs), up to 10 Phase II PAs, up to 5 Remedial Action Plans/Risk Assessments, and associated public outreach. Our goal is to reduce the threat of contaminants from brownfields throughout the City. Residents will benefit by having sites assessed to determine potential risks to human health and the environment, and cleanup planning completed to eventually eliminate these risks and promote redevelopment.

#### b. Task Description and Budget Table

Task 1 - Programmatic Costs: Programmatic costs from each budget, hazardous substances and petroleum, are included for two staff to attend two EPA Brownfields Conferences and one other brownfields training program (\$500 per person, per trip). The City of Barberton, and specifically staff from the Barberton Planning Commission will provide in-kind staff resources for programmatic management (including hiring a consultant, coordination with agency representatives, site selection and prioritization, communicating with public and private owners, and progress and financial reporting) equivalent to \$67,500 (estimating approximately 1,500 hours at an average hourly rate of \$45/hour). Outputs include continuing staff training and improved brownfields knowledge.

Task 2 - Community Outreach: Community outreach costs of approximately \$12,000 will include travel (\$3,000), supplies (\$3,000), and contractual costs (\$6,000) for conducting community outreach programs/meetings and travel to community outreach events. The City and a retained consultant will also provide in-kind staff labor, valued at approximately \$7,000 to \$10,000, to conduct outreach meetings, draft press releases, update the City website, Facebook page, and LinkedIn page, and other activities to complete community outreach. Outputs include up to three public meetings and development of marketing documents that can be used to promote area brownfields and grant availability.

Task 3 - Phase I and II Site Assessments: Sites will be evaluated through performance of Phase I and/or II ESAs (conducted in accordance with All Appropriate Inquiry ASTM Standard E1527-05) and other ASTM standards and practices, and the Ohio VAP. The City anticipates focusing assessment funds on determining the nature and extent of the contamination at the priority sites. The costs for completing Phase I and Phase II ESAs will vary depending on the complexity and whether VAP compliance is required. Based on prior brownfield experience, Barberton estimates Phase I ESAs will cost \$3,000 to \$6,000, VAP Phase I Property Assessments will cost \$7,000 to \$9,000, and Phase II ESAs will cost \$20,000 to \$50,000. The hazardous substances budget includes contractual costs of \$165,000 based on conducting five Phase I ESAs at an average cost of \$5,000 (\$25,000 total) and four Phase II ESAs at an average cost of \$35,000 each (\$140,000 total). The petroleum budget includes contractual costs of \$174,000, based on six Phase I ESAs at an average cost of \$4,000 (\$24,000 total) and six Phase II ESAs at an average cost of \$25,000 (\$150,000 total). Outputs include completion of up to 11 Phase I ESAs and up to 10 Phase II ESAs.

Task 4 - Cleanup Planning: The City will conduct cleanup /redevelopment planning in accordance with the Ohio EPA Voluntary Action Program Remedial Action Plan (RAP) or Bureau of Underground Storage Tank Regulations (BUSTR) programs, or U.S. EPA Analysis of Brownfields Cleanup Alternatives (ABCA) equivalent where redevelopment is imminent. This may include preparation of cleanup plans, assessment of cleanup/redevelopment alternatives, and evaluation of institutional and engineering controls. Contractual costs for this task are estimated at \$27,500 (hazardous substances and \$18,500 (petroleum) based on completing cleanup and reuse planning at three hazardous sites and two petroleum sites. Cleanup Plans are often critical to determine the cost of redevelopment and project viability. Outputs include up to 5 completed ABCA/RAPs. By completing this project, the City hopes to identify the brownfields that are exposing residents and the environment to contaminants; limit exposures associated with these brownfields, and bring these abandoned/underused sites back into productive use, giving residents a chance to find jobs comparable to the ones they lost. In order to evaluate its progress, the City will measure and track/document the listed outputs and outcomes. Once a site has been determined to be eligible, it will be entered into the

Assessment, Cleanup, and Redevelopment Exchange System (ACRES). The ACRES profiles will be updated following completion of Phase I and II ESAs, Analysis of Brownfields Cleanup Alternatives (ABCAs), remediation, and/or redevelopment activities. To track and measure progress the City will: 1) evaluate project achievements against those incorporated into the grant application and work plan; 2) determine if the project has resulted in an improved site (acquisition/transfer/redevelopment); and 3) report the outputs of the grant in quarterly and annual reports to the EPA and track the following outcomes and outputs to a regularly-updated project spreadsheet:

Measurable outcomes planned: number of acres of land assessed, number of jobs created/retained and tax revenue generated; number of acres of property remediated; quantity of leveraged funding, number of acres of property redeveloped, number of new jobs and tax revenue generated; quantity of redevelopment investment value, and acres of parks and greenspace preserved and created. Measurable outputs planned: Number of community meetings held, Number of ABCAs completed, Number of brownfields identified, Number of Phase I and II ESAs completed, Number of sites where cleanup planning was conducted. The City will adjust its approach to selecting sites for funds if it appears that the project is not generating the expected outcomes.

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Hazardous Subs	tances Assessment	Grant			
Budget Categories	Task 1 Programmatic Costs	Task 2 Community Outreach	Task 3 Phase I and II Assessments	Task 4 Cleanup and Reuse Planning	Total
Personnel	In kind	In kind			
Travel	1,500	1,500			3,000
Supplies		1,500			1,500
Contractual		3,000	165,000	27,500	195,500
Subtotal	1,500	6,000	165,000	27,500	200,000
Petroleum Asses	ssment Grant				
Personnel	In kind	In kind			
Travel	1,500	1,500			3,000
Supplies		1,500			1,500
Contractual		3,000	174,000	18,500	195,500
Subtotal	1,500	6,000	174,000	18,500	200,000
Overall Total	3,000	12,000	339,000	46,000	400,000

c. Ability to Leverage - Grants can be vital for catalyzing brownfields redevelopment projects because they cover the costs of site assessment needed to support liability management, project design, and remediation planning. This alone is rarely sufficient to ensure a successful redevelopment. The table below identifies local resources that the City can readily access to support assessment and subsequent cleanup and redevelopment activities.

	Table 5. Local Resource				
Source	Resources Leverage/Role of Resources	Estimated Value	Likelihood		
City of Barberton	Coordination of qualifications based selection, regulatory agencies, site selection, prioritization of funding, communication with public and private owners who would like to participate, programmatic administration (financial and progress reporting)	Approximately \$67,500 (using an average hourly rate of \$45.00) – based on providing up to 1500 hours over 3 year implementation	100% commitment (letter attached)		
Barberton Community Development Corporation (BCDC)	Marketing the program to local businesses and property owenrs, participating in meetings on site selection, and prioritizing funds for redevelopment, hosting a public workshop on the program with potential redevelopment partners	Approximately \$13,126 (using an overage hourly rate of \$63.63) – based on providing up to 200 hours over the 3 year implementation	100% commitment (letter attached)		

The following existing state and federal resources are also available by application and Barberton may seek funding from these sources for follow-on project needs following the expenditure of grant funds:

- JobsOhio Revitalization Fund Program Grants for \$200,000 for assessment, \$500,000 for asbestos-only cleanup projects, and up to \$2M for remediation activities at eligible sites with a committed redeveloper. Meetings were held the week of January 13 to discuss potential funds for the General Industries property with Jobs Ohio team leads.
- OEPA Brownfield Revolving Loan Fund (RLF) loans for cleanup/remediation activities.
- > OEPA Urban Redevelopment Loan Program land and building acquisition, infrastructure improvements, brownfield site remediation activities, and building renovation/demolition.
- Ohio Development Services Agency CODSA) Tax Increment Financing (TIF) financing for public infrastructure improvements and private improvements.
- Additional EPA Assessment, Cleanup, and Revolving Loan Fund (RLF) Grants additional Assessment Grants (up to \$600,000 as part of Coalition grants), cleanup (\$200,000 per grantee-owned site), and RLF (up to \$1 million).

The City also intends to pursue U.S. EPA Brownfields Cleanup Grants, Brownfields Revolving Loan Funds, and HUD Brownfields Economic Development Initiative (BEDI) funding as necessary to complete cleanup of sites assessed with this grant. We may also leverage non-brownfields programs, such as Tax Increment Financing (TIF) and Historic Tax Credits. The likelihood of receipt of these funds is high. The City has worked with Neighborhood Development Services, a non-profit developer, to revitalize a vacant theatre in the City's historic downtown. The building is on the National Register, NDS purchased the property for over \$500,000 and invested over \$250,000 in restoration, creating 7 full-time jobs. The City has a long history of working with Barberton Community Development Corporation as a partner in redevelopment. Successful examples of recent projects include ALCOA and JENCO. ALCOA, located at 842 Norton Avenue, recently has planned a \$21 Million investment for adding new casting manufacturing capabilities to produce aluminum ingot from by-products of the current finishing processes. The estimated amount of annual payroll the new full time employees will add is \$871,728.00 (within a 3-year period); and 2) OUI (Jenco) - Jenco Construction is expanding into a new building on 16th Street SW to expand operations and enable approximately 30,000 square feet of industrial space to be made available for businesses expanding or relocating to Barberton. Total square footage once completed will be approximately 30,000 square feet, with 3,000 square feet of offices, with the potential for expansion to approximately 50,000 square feet. \$1.4 million will be invested by OUI Inc to expand operations and 10 Full Time Jobs will be created. The new positions will add \$500,000 to OUl's annual payroll. Recent leveraging for the City's Seiberling Project are also referenced in Section 4.c.i.

#### 3. Community Engagement and Partnerships

a. Outreach Plan. The City intends to implement a comprehensive plan to involve the community in the grant project. This plan includes a Task Force comprised of the partner groups listed in Section 3.c, which include local civic, watershed, business, educational, fraternal, and economic development groups, as well as representatives from the cities, County and local government agencies. The intent of the committee is to assist in the implementation of the grant, including public outreach, site prioritization and preliminary redevelopment plans. The group will be invited to meet at least annually (depending on their role). Following successful award of the grant, notice of the meetings will be provided to the public via media alerts 48 hours in advance stating the meeting date and time. Following notice of an Assessment Grant award, the City will announce the award and the availability of the draft Work Plan to the community through a press release to the local newspapers (Barberton Herald) and by posting a notice on the City's websites. The City will place advertisements on the local area radio stations (WHLO Radio 640 AM, WCPN Radio FM-90.3 and WKSU National Public Radio) and the WVIZ/PBS "idea stream channel 25.1" Cleveland – which is a public access television station, to reach residents at every educational level and those without internet service. We will also send written or electronic notices to local business leaders (bankers, real estate brokers, developers). The City will establish a Facebook page and LinkedIn group for the grant, which will allow the community to interact with the County during the entire project. The County will include instructions on how to reach these internet forums in the initial press release. The City intends that communications will be primarily provided in English, which is the primary language used in Barberton. However, to ensure inclusion of all communities, communications may also be provided in other languages when needed. The 2008-2012 ACS shows that 4.1% of the Barberton population speaks a language other than English and of those, 1.0% speaks English less than 'very well.' In order to accommodate communications in languages other than English, the City will supplement communication efforts with a translation/interpretation service provided by the Barberton City Schools Spanish Club, et. al (as indicated in their letter included in Attachment B) and as appropriate. Hard copies of the draft Work Plan will be made available at City Hall, on the City's website, and also at the City of Barberton Library to ensure access for those without appropriate information technology availability, knowledge, or experience, The public will be able to provide comments verbally by phone or through email to the City of Barberton staff, electronically on

Facebook and LinkedIn, and in writing via letters to the City. All comments received will be discussed during a public meeting hosted by City and the draft Work Plan will be modified in response to relevant comments.

Following Work Plan approval, the City will communicate project progress by first scheduling a public kick-off meeting to acquaint the community with the project and its goals. Meetings will be held at the City offices, Task Force partner offices, or the Barberton Library. The City will solicit nominations for the brownfields inventory, site prioritization criteria, as well as request information about interested developers and redevelopment goals. The City will incorporate appropriate sites nominated by citizens and community organizations into the brownfields inventory and determine site prioritization criteria. Subsequent public meetings will be held if additional information regarding the brownfields project is requested by citizens or community organizations. Meeting presentation materials and minutes will be posted on Facebook, LinkedIn, and the City's website. Project updates will be provided at monthly public City Council meetings. The City will also conduct public meetings at major project milestones, including: 1) project kick-off; 2) completion of Phase I and II activities; and 3) reuse and remedial planning. Specific stakeholders, such as residents adjacent to a targeted site, may also receive information via mail or phone. City representatives will make presentations to describe the grant process and address the concerns of local residents and business owners. City project team representatives will also attend community organization meetings to discuss the project and/or specific site assessments.

After an assessment is completed, the primary information flow will be outward to the community, notifying local stakeholders about assessment activities, providing results of the assessments, and explaining health and environmental impacts. Assessment results will be posted on the City's website, Facebook, and Linkedln. If health threats are identified, the City will send written notices to impacted citizens and contact the City of Barberton Health District and Summit County Health Department (Section 3.b.i). The City will provide a factsheet on the Barberton website to be updated for public comment when each quarterly report is submitted to U.S. EPA. In addition, the City will utilize the online Assessment, Cleanup and Redevelopment Exchange System (ACRES) to submit site data to U.S. EPA. This information will then be used to develop project profiles so that the public can track the progress of sites in their community. The City will also make available copies of any funding applications for cleanup at sites assessed under the requested grant and provide brochures and fact sheets to educate the public. When cleanup and/or redevelopment planning is initiated, more intensive involvement activities, including explanations of plans and rationales and solicitation of comments and feedback on those plans, will be implemented. These efforts will involve collaborating with community members, agencies, and businesses to identify appropriate end uses and create a redevelopment plan for the site. The City is committed to utilizing grant funds to become more fiscally and environmentally sustainable. As applicable, during the redevelopment of brownfield sites, the City will consult with the Northeast Ohio chapter of the U.S. Green Building Council concerning the utilization of sustainable/green building approaches and techniques. At the close of the project, the City will hold a final public meeting to notify the community of the outcomes of the project. The presentation materials and minutes will be archived and placed on the City's website, Facebook, and LinkedIn. Job opportunities in brownfields assessment, cleanup, or redevelopment related to the brownfield program will be posted on the Summit County Department of Job and Family Services website.

#### b. Partnerships with Government Agencies

i. Local/State Environmental and Health Agencies. The City will partner with local and state environmental & health agencies to ensure that the project is successful. The City will establish a strong partnership with Ohio Environmental Protection Agency (OEPA) to ensure future assessment, cleanup, and redevelopment activities at brownfields comply with the rules and guidance promulgated by the OEPA Voluntary Action Program (V AP), as applicable. In Ohio, petroleum assessment and remediation from Underground Storage Tanks is managed within the Department of Commerce, specifically the Bureau of Underground Storage Tank Regulation (BUSTR). This entity will be the regulatory entity to approve eligibility of project sites under petroleum funding. The City will work with both of these groups to ensure compliance with applicable programs and procedures. The City has a strong and productive partnership with Ohio EPA, Ohio Department of Transportation, and local education institutions such as The University of Akron. In addition, Barberton City Health District has been active in education/notification, testing, and monitoring related to septic system concerns, lead poisoning, and groundwater protection. The expertise and experience of City of Barberton Health District and Summit County Health Department will be called upon to help identify/verify off-site health threats posed by identified contamination; identify related toxicological issues and perform risk evaluations; design and conduct notification/education programs; and coordinate health testing if migration of contamination from a brownfields site is confirmed. When contamination is discovered on brownfields, the cleanup criteria established by the Ohio EPA under the Ohio VAP will be used to identify and address on-site health and environmental threats posed by the contamination. If contamination discovered

through assessment of brownfields has the potential to negatively impact the health of local populations, especially as related to off-site exposures, the Ohio EPA, Ohio Department of Health and Summit County Health Department will be notified and broughtin to support site needs.

ii. Other Relevant Federal, State, and Local Government Agencies. In addition to Ohio EPA and BUSTR, the City will work closely with the Ohio Development Services Agency (ODSA) and Jobs Ohio (a private redevelopment entity recently created to assist in financing projects and creating jobs in Ohio) to help ensure appropriate project needs are met. These two entities will support pursuit of funding for follow-on cleanup or redevelopment funding needs. In Ohio, they work in partnership with Ohio EPA who provides oversight on prerequisite assessment and cleanup planning activities that occur at brown fields. There are no EPA Environmental Workforce Development and Job Training programs currently operating the City. The City coordinates with the Summit County Department of Job and Family Services to assist local businesses with training new workers and retraining existing workers. Job opportunities in brownfields assessment, cleanup, or redevelopment related to the brownfield program will be posted on the Summit County Department of Job and Family Services website.

#### c. Partnerships with Community Organizations

The City has identified the following organizations who will be project partners. The organizations' letters of support are included in Attachment B.

Barberton Community Development Corporation: Local corporation dedicated to job creation and providing incentives for business development; commitment to provide in-kind use of staff as detailed in leveraged resources section, and will provide marketing support of the brownfields program to local businesses and property owners, participation in meetings and site selection/prioritization, as well as host a public workshop on the program for local businesses and potential development partners (See Attachment C).

Barberton City Schools- local school district comprising ages 5 years to 18 years; commitment to provide in kind support for site selection/prioritization, public outreach, meeting facilities, learning lab opportunities (connections with curriculum for science, engineering, journalism or Spanish), Spanish translation services, and sustainable redevelopment planning. Neighborhood Development Services (NDS) - local non-profit development organization with offices in Barberton; dedicated to neighborhood revitalization; commitment to provide in kind use of staff for public education/outreach, distribution of project information, including space dedicated to brownfields efforts on their webpage, social media pages and general advocacy. Kiwanis- volunteer organization dedicated to providing community service; will provide times for the planning department to speak at meetings over the grant timeframe, educate members on the benefits and accomplishments of the program Rotary Club/Foundation of Barberton – volunteer organization representing many local businesses who provide service to the community; will provide times for the planning department to speak at meetings over the grant timeframe, educate members on the benefits and accomplishments of the program

#### 4. Proiect Benefits

a. Health and/or Welfare and Environment. Redevelopment of brownfields will improve residents' health and welfare by removing sources of contamination and limiting inhalation, ingestion, and dermal exposures, which corresponds with goal of the City's Master Plan of creating a vibrant community. The specific health and welfare benefits associated with use of grant funds to stimulate redevelopment of the priority sites are summarized in the following table. Similar benefits, in whole or part, can be expected from redevelopment of smaller brownfields. Redevelopment of these brownfields epitomizes the equitable development principles of utilizing new investment in economically disadvantaged neighborhoods in a way that directly benefits the residents. Because this work will be completed on existing industrial sites, residents will reap the benefits without being displaced from their homes or neighborhoods. These redevelopment outcomes coincide with the guiding Livability Principles (Principles adopted by the partnership between the EPA, United States Department of Transportation, and United States Department of Housing and Urban Development to promote smart growth) of increasing economic competiveness, leveraging federal investment, and valuing and supporting the community and its neighborhoods. The redevelopment of priority brownfields will also limit uncontrolled nonpoint pollution sources and illicit discharges and improve water and sediment quality in the watersheds that begin in Summit County, including the Tuscarawas River and Wolf Creek. This will reduce contaminants in these waterways, improving aquatic life and allowing for greater fishing and recreational opportunities.

Table 6. Health and Welfare Benefits		
Priority Site	Health and Welfare Benefits	
Vacant gas stations (various)	The extent of soil and groundwater that have been impacted by BTEX, MTBE, waste oils and diesel will be determined. Removal/capping of contaminated soil will eliminate airborne vapor and particulate inhalation/ingestion threats.	
Former Sun Rubber property	The extent of soil and groundwater that have been impacted by chlorinated solvents, PAHs, organic vulcanizers, pigments, resins, otoluidine, and aniline will be determined. Soil remediation/engineering controls will eliminate airborne vapor and particulate inhalation/ingestion threats. Remediation will benefit the Tuscarawas River, which is immediately adjacent, and children and families who live in adjacent property to the East.	
Former Sieberling Rubber Company (20 acres) 345 15th Street NW	The extent of soil and groundwater that have been impacted by chlorinated solvents, PAHs, organic vulcanizers, pigments, resins, otoluidine, and aniline will be determined. Soil remediation/engineering controls will eliminate airborne vapor and particulate inhalation/ingestion threats for adjacent residents and Wolf Creek.	
Former Rockwell Manufacturing Co. (40 acres) 401 Newell St.	The extent of soil and groundwater that have been impacted by chlorinated solvents, BTEX, PAHs, and heavy metals will be determined. Removal/capping of contaminated soil will eliminate airborne vapor and particulate inhalation/ingestion threats. Remediation will benefit youth and children attending the Middle School and High School located on adjacent property, as well as residential to the North and East and South.	
Former meth lab – 290 Wooster Rd. N	The extent of soil and groundwater that have been impacted by controlled substances, solvents, and chemicals will be determined. Soil remediation/engineering controls will eliminate airborne vapor and particulate inhalation/ingestion threats.	

Assessment Grant operating procedures will ensure that the community is protected from contaminants during assessment work. A Health and Safety Plan (HASP) will be completed for each site where intrusive sampling will occur, and access to the site will be controlled with fencing and signage during assessment operations. As specified in the HASP, when subsurface samples are collected or hazardous building materials are disturbed, the release of particulates and vapors will be monitored and controlled. Decontamination and purge water generated during groundwater sampling activities will be containerized on-site and appropriately disposed. The assessment data generated will be used to help the City and/or a developer determine how to protect the both the community and construction/site workers during redevelopment activities.

#### Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

i. Community Planning for Sustainable Redevelopment. Sustainable development principles including strategic land use planning. where land use is matched to available infrastructure, and preserving rural and natural resources are woven into the City's Comprehensive Plan. Because most brownfields in the City are abandoned or underutilized manufacturing buildings located in urban areas of Barberton, and are primarily served with existing infrastructure, the reuse of these sites epitomizes sustainable redevelopment. By incentivizing brownfields redevelopment, the City will direct development into areas with existing infrastructure, limiting expenditures on utility extensions, reducing the use of construction materials and reducing air emissions (e.g., greenhouse gases, particulate matter) from construction. The City will encourage/require the use of green site investigation (e.g., in-situ data loggers, direct-push drilling) and remediation techniques (e.g., idling reduction plans for equipment, diesel vehicle retrofit technologies) during brownfields cleanup and redevelopment. The City will also encourage incorporating innovative storm water management techniques (rain gardens, bioswales, etc.), and other sustainable design approaches, such as demolition and construction materials recycling, and use of low-volatility materials into brownfields redevelopments. The City has evaluated design elements that could be a part of sustainable reuse of brownfield properties, including dark sky compliant light fixtures, rain gardens along streets, larger bioretention cells on the areas of the site nearest the river, capture and reuse of runoff for irrigation, and green parking lot design to include biofiltration areas and permeable pavement. When existing buildings must be removed, the City will encourage deconstruction, rather than traditional demolition. These sustainable development approaches will help the City reuse existing resources, reduce fossil fuel use and emissions, and minimize its energy use and waste generation during brownfields redevelopment. The City of Barberton is currently implementing green remediation in its Robinson Avenue Green Stream Restoration and Stormwater Pond Enhancement Project. Features of the project include: 1) proposed stormwater pond enhancement, including wetland fringe which treats stormwater through plant uptake, adsorption, physical filtration, microbial decomposition, and shading; and 2) proposed stream improvements to restore the natural channel by relocating channelized segment of the stream to the center of property to improve buffers, which will filter runoff from adjacent land uses before it enters

the stream, plant buffers with native species, and restore sinuosity and riffle/run/pool systems to improve aquatic habitat, dissipate energy, and increase downstream oxygen levels.

ii. Examples of Equitable Development/Livability. With an Assessment Grant, the City will be able to incentivize the redevelopment of brownfields and provide substantial health and welfare, economic, and environmental benefits to its residents. The City needs a healthy economy to provide jobs, raise the standard of living for its lower income residents, protect the public health and welfare, and protect and enhance the environment. A major component of the City's economic development strategy is to incentivize redevelopment of brownfields. The City will use the Assessment Grant funds to begin inventorying and assessing brownfields with a focus on 1) previously identified priority brownfields in or near residential neighborhoods in the downtown and Central River Census tracts; 2) sites near the City's natural resources, especially the Tuscarawas River and its tributanes and the Ohio and Erie Canal; and, 3) other industrial/commercial brownfields throughout the City. Assessment Grant funds will attract businesses by reducing environmental due diligence costs; facilitating access to other brownfields redevelopment support, such as the Jobs Ohio Revitalization Fund; and providing needed data for redevelopment planning and safe reuse. Stimulated redevelopment will protect the health and welfare of residents and the environment by reducing and controlling site contamination and off-site migration. Redevelopment of brownfields will help invigorate the City's economy by attracting companies to the area and allowing existing companies to expand, increasing job opportunities, improving property values, and increasing the tax base. Redevelopment of brownfields will allow the City to sustainably reuse existing infrastructure and promote conservation of natural resources, especially along the Tuscarawas River. The outcomes of redeveloping these brownfields correspond with the Livability Principles of supporting existing communities, valuing communities and neighborhoods, and increasing economic competitiveness. Redeveloping the City's brownfields will: 1) support the existing communities by discouraging sprawl, which will help to preserve the natural resources and rural character of the City; 2) value communities and neighborhoods by removing contamination and limiting residents' exposures to contaminants, which will improve the health and welfare of the City's communities and neighborhoods; and 3) increase the City's economic competitiveness by creating jobs and increasing the tax base.

#### c. Economic or non-Economic Benefits (long term benefits)

i. Economic Benefits. By receiving U.S. EPA funding, the City will be able to achieve direct economic benefits, including: 1) returning blighted properties to productive uses that create taxes and jobs; 2) creating market-ready sites at attractive locations; 3) encouraging the reuse of built land for infill development; 4) achieving improvements in distressed neighborhoods; and 5) completing remedial plans to support cleanup grants from state and federal programs. Achievement of these goals via U.S. EPA funding will attract residents and visitors and act as a catalyst for implementation of local plans, such as the Barberton Master Plan (2006), and revitalization of our entire region. The biggest economic benefits to be achieved via brownfield redevelopment are job creation and increased tax revenues, supporting key objectives of the City's Master Plan. Residents in the Downtown and throughout the City will once again have access to nearby jobs and retail services. Redevelopment of manufacturing sites for commercial and/or manufacturing reuse is a high priority. Barberton's goal is to replace as many of the previously lost, higher wage jobs as possible for City residents. This will only accomplished by redevelopment of both the large brownfields (former Sieberling Rubber property, Rockwell property) and the small brownfields (gas stations, auto repair shops, machine shops, and former salvage operations). Assessment grants funds will help new businesses offset the higher costs of environmental due diligence, site cleanup and redevelopment planning, and exposure controls. The properties identified at the heart of the downtown (including potential smaller sites such as retail/commercial) may have significant impact on the neighborhood. Large or small - direct economic impacts from brownfields include the loss of jobs and economic activity, indirect impacts include vacant and decaying buildings that cause blight (contamination from lead and asbestos, emigration of other business, and decreased property values. Redevelopment of smaller brownfields in the downtown neighborhood with mixed-use commercial/residential redevelopments will create affordable housing with easy access to downtown commercial and retail amenities. Increased property values and improved image will be the results of using U.S. EPA funding to attract new businesses and provide needed jobs. Higher tax revenues will produce strengthened City government operations, Increased tax revenues will allow the City to improve provision of critical services, increase economic development and provide additional resources. These outcomes coincide with the guiding Livability Principals of valuing and supporting community neighborhoods and increasing economic competitiveness. A recent example our redevelopment success is the Seiberling Building (comprised of 335,520 +/- SF of manufacturing /distribution space on five levels and a 51,296 SF +/- three story office building). This building sat empty for approximately seven years causing the building to deteriorate. The roof was leaking in many places, weeds were overtaking the lots and growing up the sides of the building, and windows and doors were damaged by vandalism. Barberton Community Development Corporation and partners have invested \$951,260.85 to date which includes the purchase price and warehouse improvements, including repairs to

the rail spur and tower. The majority of repairs and maintenance have been spent on the warehouse/distribution areas. Currently, 300,000+ SF of this area is being rented. Project funds committed to date are: 1) \$700,000 Purchase Price BLIC/Barberton Community Foundation Grant; 2) \$350,000 USEPA Assessment Grant; 3) 387,626 COAF (Clean Ohio Assistance Fund) Office Building Abatement; 4) \$289,310 COAF Phase II and \$1,000,000 Renovation/Improvements to Warehouse /BLIC. To date, 12 jobs have been created with the potential of 250+/- higher wage jobs once the office building is completed.

ii. Local Hiring/Procurement. The City of Barberton will work with Four Cities Compact (Barberton, Wadsworth, Norton and Copley) to promote local hiring and procurement and link members of the community to potential employment opportunities in brownfields assessment, cleanup, or redevelopment related to your proposed projects. The organization is a part of the Barberton City Schools and routinely assists students to connect with employers and provide job search assistance, employee recruitment, on-the-job training. Upon grant award, the Four Cities Compact has committed to assist the City in workforce development. Specifically, their role would be in the form of on-the-job training to provide assistance to new and expanding businesses that may occupy any of the brownfield properties where a redevelopment may occur. This is well within our capability as we often provide training and talent development, employee selection support, employee recruitment and human resource planning and management.

#### 5. Programmatic Capability and Past Performance

- a. Programmatic Capability. The City is ready to implement the U.S. EPA Assessment Grant and our project team will ensure the timely and successful expenditure of funding. The project implementation team will include the representatives to address the administrative (City of Barberton), financial (Barberton Finance Department), redevelopment strategy (Barberton Community Development Corporation) and technical (qualified environmental consultant partner) needs of the project and grant. Mr. Joseph Stefan, Interim Planning Director, will manage the requested grant and act as Project Director. Mr. Stefan has ten years experience in the public sector, and has co-managed prior U.S. EPA grants and Community Development Block Grant programs for the City. Mr. Stefan will be supported by Stacey Carr, Strategic Planner, who has five years experience in the public sector as well as Mr. Michael Vinay, Building Inspector/Property Manager, who has 15 years experience with the City of Barberton. The City will endeavor to maintain the grant management team in place during the entire grant project. In the event of loss of the project director, Mr. Vinay will become the project director. Mr. Vinay will be involved and become intimately familiar with grant operations so he can immediately step in as interim or replacement project director in case of loss or re-assignment of the active project director. The City and the environmental consultant will have the primary responsibility for continued operations, selection, and training of a successor project manager, should it become necessary. The City's finance department will assist in providing any financial tracking and grant documentation support to ensure that grant reporting requirements are met. In addition, the City will retain a highly competent environmental consultant to assist in managing and tracking the activities funded by the Assessment Grants and to conduct the environmental assessments. The environmental consultant will be retained using a Qualifications-Based Selection Process that complies with the applicable federal procurement regulations (40 CFR§31.36). The selected consultant will be experienced in all aspects of EPA Assessment Grant management and will have demonstrated extensive experience with, and understanding of, the Ohio Voluntary Action Program (VAP), managed at least five EPA Assessment Grants projects, and successfully managed at least three successful brown fields' redevelopment projects where multiple brownfields redevelopment financing incentives were leveraged. The City will use its knowledge, past experiences and successes with federal and non-federal assistance agreements to effectively manage the Assessment Grant. The City's economic development team is qualified to undertake Assessment Grant management, including the completion and submittal of a Cooperative Agreement and Work Plan: enrollment in the Automated Standard Application for Payment system, and submittal of progress reports to the EPA Project Officer, specifying assessment tasks completed, financial tracking, and proposed grant activities.
- **b.** Audit Findings The City has had a long history of managing federal and state funds and we have never had any adverse audit findings relating to the management of those funds. The City has not received any adverse audit findings from an OMB Circular A-133 audit, an audit conducted by a federal, state, tribal or local government inspector general or similar organization, or audits conducted by the U.S. General Accounting Office. We are not, nor have previously been required to comply with special "high risk" terms and conditions under agency regulations implementing OMB Circular A-102.

#### c. Past Performance and Accomplishments

- i) Currently or Has Ever Received an EPA Brownfields Assessment, Revolving Loan Fund, or Cleanup Grant
- 1. Compliance with Grant Requirements: Barberton is a five-time past recipient of U.S. EPA funding in 1999, 2004, 2007, 2009 and 2010. These awards included an Assessment Demonstration Pilot (1999), a Site-Specific Hazardous Assessment Grant (2004; BP96556901) a Community-Wide Hazardous and Petroleum Assessment Grant (2007; BF00E33501), a 2009 ARRA Site-Specific

Cleanup Grant, and a 2010 Community-Wide Assessment Grant (00E00424-0). Our most recent grant is nearly complete, and according to our most recently submitted quarterly report, we have expended \$395,847 of our \$400,000 total allocation. Our first quarter report for FY2014 will include close-out documentation for grant completion. Accomplishments under our prior grant included the completion of a QAPP, 5 Site Eligibility Determinations, 3 Ohio VAP Phase I Environmental Site Assessments on very large parcels, 2 Site Sampling Plans and Phase II Assessments in compliance with the Ohio VAP program, and leveraging Clean Ohio Assistance Funds in the amount of \$750,000 for asbestos remediation for office renovations at a large brownfield, and 3 public outreach meetings. Barberton has a successful track record of compliance with all management aspects of our grants, including all phases of work. We have complied with our 5 Work Plans, all of the schedules for progress, and terms and conditions. We have made sufficient progress towards achieving the expected results of the grant in a timely manner. We have built built specifications for remediation through our City Engineering Department, and implemented them on the Pete's Sunoco remediation project, Barberton 888 Wooster Road Assessment and Cleanup Project, and Sieberling Office Complex asbestos cleanup. In the course of all of these years we have never had a deficient compliance audit, and have completed all quarterly performance, technical and annual reporting, as well as ongoing ACRES reporting. While we have assessed many sites, there is still much work to do on key targeted properties. Ohio has recently suspended funding for Phase II Assessments for projects that do not have a developer (Clean Ohio Assistance Funding) so without additional U.S. EPA funding, we will not be able to build the prerequisites necessary for additional cleanup and demolition dollars. For only one of our Brownfields Grants, our site-specific assessment grant in 2004, we returned over \$60,000 to the U.S. EPA because we were so efficient in our use of funding and were restricted (site-specific) from using it on any additional parcels.

2. Accomplishments: Since 1999, the City has overseen the selection of environmental consultant partners, worked with over 30 private property owners to obtain access for assessment activities, and conducted over 25 site eligibility requests, overseen the completion of up to 25 Phase I and 15 Phase II Assessments, 8 Remedial Action Plans/ABCAs, and held over a dozen public meetings, workshops, and countless one-on-one meetings with property owners and regulatory officials. Due to the age and tracking of our grant agreements, we were not able to confirm these outcome values in ACRES at the time of proposal submission. If the definition of success is defined by a No Further Action letter and Covenant Not to Sue (issued in Ohio when the State EPA confirms that cleanup is complete) we feel proud to have achieved NFAs on very large properties. These include Linform Service, Inc. (a manufacturer of linens and uniforms) with an Ohio Voluntary Action Program (VAP) Urban Setting Designation; the 888 Wooster Road Redevelopment, and Seiberling Asbestos Abatement. U.S. EPA funding has made possible the acquisition of large brownfields by the City and Barberton Community Development Corporation. Earlier grants in 2005 through 2007 allowed the City to assess portions of the former High School and Industrial Arts complex. The project included subsurface assessments, a risk evaluation and Phase II report. Upon completion of the assessment work, the City and Barberton Community Development Corporation, in conjunction with the YMCA, successfully developed portions of the properties into a new downtown YMCA and Senior Community Center. During early 2008, a Phase I Property Assessment (PA) and Sampling & Analyses Plan (SAP) were prepared for the 888 Wooster Road Redevelopment site located near downtown. During the summer and fall 2008 a Phase II PA was completed that also included a Property-specific Risk Assessment. These studies formed the basis of a Remedial Action Plan that was developed to clean-up the Property in accordance with Ohio VAP rules. This information was used to prepare a \$1.5M Clean Ohio Revitalization Fund grant application that was awarded through the Ohio Department of Development (ODOD) in May 2009. Clean-up activities on this Property have been completed and a No Further Action letter was recently approved for the property. A \$200,000 U.S. EPA Brownfield Petroleum Clean-up grant was awarded to the City for the Pete's Sunoco site during the summer of 2009. Site cleanup activities are complete and a No Further Action status for the Property under the Ohio Department of Commerce Bureau of Underground Storage Tank Regulations (BUSTR). Two large Phase II Assessments were completed with recent 2010 Assessment Grant funding.

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#### LIST OF ATTACHMENTS

- Threshold Documentation, Public Outreach Planning and Letters of Support from State Agencies (A)
- Letters of Support from Community-Based Organizations. (B)
- (C) Leveraged Resource Documentation
- (D) Special Considerations Checklist

## Attachment A

Threshold Documentation and Letters from the State Authorities

## City of Barberton, Ohio

#### Threshold Criteria for Assessment Grant

- Applicant Eligibility: The City of Barberton is a general purpose unit of local government in the State of Ohio.
- 2. Letters from the State or Tribal Environmental Authority: Letters form the Ohio Environmental Protection Agency (OEPA) and Ohio Bureau of Underground Storage Tank Regulation (BUSTR) are attached.

#### Community Involvement:

Outreach Plan. The City intends to implement a comprehensive plan to involve the community in the grant project. This plan includes a Task Force comprised of the partner groups listed in Section 3.c, which include local civic, watershed, business, educational, fraternal, and economic development groups, as well as representatives from the cities, County and local government agencies. The intent of the committee is to assist in the implementation of the grant, including public outreach, site prioritization and preliminary redevelopment plans. The group will be invited to meet at least annually (depending on their role). Following successful award of the grant, notice of the meetings will be provided to the public via media alerts 48 hours in advance stating the meeting date and time. Following notice of an Assessment Grant award, the City will announce the award and the availability of the draft Work Plan to the community through a press release to the local newspapers (Barberton Herald) and by posting a notice on the City's websites. The City will place advertisements on the local area radio stations (WHLO Radio 640 AM, WCPN Radio FM-90.3 and WKSU National Public Radio) and the WVIZ/PBS "idea stream channel 25.1" Cleveland - which is a public access television station, to reach residents at every educational level and those without internet service. We will also send written or electronic notices to local business leaders (bankers, real estate brokers, developers). The City will establish a Facebook page and LinkedIn group for the grant, which will allow the community to interact with the County during the entire project. The County will include instructions on how to reach these internet forums in the initial press release. The City intends that communications will be primarily provided in English, which is the primary language used in Barberton. However, to ensure inclusion of all communities, communications may also be provided in other languages when needed. The 2008-2012 ACS shows that 4.1% of the Barberton population speaks a language other than English and of those, 1.0% speaks English less than 'very well.' In order to accommodate communications in languages other than English, the City will supplement communication efforts with a translation/interpretation service provided by the Barberton City Schools Spanish Club, et. al (as indicated in their letter included in Attachment B) and as appropriate. Hard copies of the draft Work Plan will be made available at City Hall, on the City's website, and also at the City of Barberton Library to ensure access for those without appropriate information technology availability, knowledge, or experience. The public will be able to provide comments verbally by phone or through email to the City of Barberton staff, electronically on Facebook and LinkedIn, and in writing via letters to the City. All comments received will be

discussed during a public meeting hosted by City and the draft Work Plan will be modified in response to relevant comments.

Following Work Plan approval, the City will communicate project progress by first scheduling a public kick-off meeting to acquaint the community with the project and its goals. Meetings will be held at the City offices, Task Force partner offices, or the Barberton Library. The City will solicit nominations for the brownfields inventory, site prioritization criteria, as well as request information about interested developers and redevelopment goals. The City will incorporate appropriate sites nominated by citizens and community organizations into the brownfields inventory and determine site prioritization criteria. Subsequent public meetings will be held if additional information regarding the brownfields project is requested by citizens or community organizations. Meeting presentation materials and minutes will be posted on Facebook, LinkedIn, and the City's website. Project updates will be provided at monthly public City Council meetings. The City will also conduct public meetings at major project milestones, including: 1) project kick-off; 2) completion of Phase I and II activities; and 3) reuse and remedial planning. Specific stakeholders, such as residents adjacent to a targeted site, may also receive information via mail or phone. City representatives will make presentations to describe the grant process and address the concerns of local residents and business owners. City project team representatives will also attend community organization meetings to discuss the project and/or specific site assessments.

After an assessment is completed, the primary information flow will be outward to the community, notifying local stakeholders about assessment activities, providing results of the assessments, and explaining health and environmental impacts. Assessment results will be posted on the City's website, Facebook, and LinkedIn. If health threats are identified, the City will send written notices to impacted citizens and contact the City of Barberton Health District and Summit County Health Department (Section 3.b.i). The City will provide a factsheet on the Barberton website to be updated for public comment when each quarterly report is submitted to U.S. EPA. In addition, the City will utilize the online Assessment, Cleanup and Redevelopment Exchange System (ACRES) to submit site data to U.S. EPA. This information will then be used to develop project profiles so that the public can track the progress of sites in their community. The City will also make available copies of any funding applications for cleanup at sites assessed under the requested grant and provide brochures and fact sheets to educate the public. When cleanup and/or redevelopment planning is initiated, more intensive involvement activities, including explanations of plans and rationales and solicitation of comments and feedback on those plans, will be implemented. These efforts will involve collaborating with community members, agencies, and businesses to identify appropriate end uses and create a redevelopment plan for the site. The City is committed to utilizing grant funds to become more fiscally and environmentally sustainable. As applicable, during the redevelopment of brownfield sites, the City will consult with the Northeast Ohio chapter of the U.S. Green Building Council concerning the utilization of sustainable/green building approaches and techniques. At the close of the project, the City will hold a final public meeting to notify the community of the outcomes of the project. The presentation materials and minutes will be archived and placed on the City's website, Facebook, and Linkedln. Job opportunities in brownfields assessment, cleanup, or redevelopment related to the brownfield program will be posted on the Summit County Department of Job and Family Services website.

Site Eligibility and Property Ownership Eligibility: The applicant is requesting a community-wide assessment grant; therefore, site eligibility and property ownership eligibility criteria do not apply.



John R. Kasich, Governor Mary Taylor, tt. Governor

January 8, 2014

U.S. Environmental Protection Agency, Region 5 Brownfields and Early Action Section ATTN: Linda Mangrum and Kelley Moore 77 West Jackson Blvd. Mail Code SM-7J Chicago, IL 60604-3507

RE: City of Barberton Community-Wide Assessment Grant Proposal

Dear Ms. Mangrum and Ms. Moore:

I am pleased to offer Ohio EPA's support for the City of Barberton Community-Wide Assessment Grant proposal. We have worked with Ohio's Brownfield communities in the past and hope to be able to provide support to the City of Barberton under the Assessment, Cleanup and Revolving Loan Fund Grant program established by the Small Business Liability Relief and Brownfield Revitalization Act (P.L. 107-118).

The funding the City of Barberton is requesting under their community-wide assessment grant proposal will be used to complete Phase I and Phase II assessments and remedial planning at properties contaminated with petroleum and/or hazardous substances, as well as perform public education and outreach. The county has not selected specific sites but will use the funding to assess, characterize, and prioritize multiple sites that meet the federal definition of brownfields and are determined eligible by Ohio EPA and/or BUSTR. This grant would eliminate significant threats to the environment and public health and provide opportunities for redevelopment and revitalization of the local community and economy.

If this grant is awarded, it would provide the City with an opportunity to build upon recent brownfields successes. The City of Barberton successfully implemented a community-wide assessment demonstration pilot grant in 1999 and a site-specific assessment grant in 2004, and is the current recipient of community-wide assessment grants for petroleum and hazardous substances (2007 and 2010). The requested funding from the U.S. EPA would continue the momentum towards revitalization made possible by the assessment activities completed under these previous grants.

We look forward to working with the City of Barberton and U.S. EPA on this project. If you have any questions, please do not hesitate to contact me at 614-644-2285.

Sincerely,

Amy Yersavich, Manager

Ohio Environmental Protection Agency

Site Assistance and Brownfield Revitalization

cc: Diane Sheridan, MPA, Planning Director, City of Barberton Rod Beal, Ohio EPA, DERR/NEDO Nancy Zikmanis, Ohio EPA, DERR/NEDO



December 11, 2013

Ms. Linda Mangrum
U.S. EPA Brownfield Contact, Region 5
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Mail Code SM-7J
Chicago, IL 60604-3507

Subject: City of Barberton - USEPA Petroleum Brownfield Assessment proposal

Dear Ms. Mangrum:

This letter acknowledges that the City of Barberton notified the Office of the Fire Marshal, Bureau of Underground Storage Tank Regulations (BUSTR) of its plans to use the \$200,000 grant proposal for a community-wide brownfield assessment for petroleum waste. Sites being considered are old manufacturing facilities, defense contracting, former rubber, iron and steel operations.

This project is a part of a redevelopment project in Barberton. The completion of the inventory, assessment, and subsequent environmental work will benefit the future citizens/workers by providing a healthier work environment. The losses of these industries and manufactures have left the City of Barberton with tracts of contaminated land, decaying infrastructure and a depleted tax base. The underutilization of these facilities is disruptive to the community and compromised redevelopment efforts. The City hopes to assess, clean up and raze former industrial facilities, eliminating threats to the environment and public health and providing opportunities for redevelopment and revitalization of the local community and economy.

The applicant provided BUSTR with information regarding the planned project and requested BUSTR make a necessary determination on eligibility for brownfields funding. Based on the information provided, BUSTR has determined that:

- The sites are of "relatively low risk" as compared with other petroleum-only sites since the sites are not being cleaned up using LUST trust fund monies.
- There is no viable responsible party as defined by the U.S.EPA request for proposal publication EPA-OSWER--OBLR-13-05, Section III.
- The applicant is a volunteer who is not potentially liable for the petroleum contamination because the applicant has not dispensed petroleum or petroleum products at the sites.
- The sites are not subject to any order under RCRA (Sec. 9003(h).

Page 2 December 11, 2013 U.S. EPA, Region 5

I am pleased to offer BUSTR's support for the City of Barberton Petroleum Brownfield Assessment Grant proposal. We look forward to working with the City of Barberton and the U.S.EPA on this project.

Sincerely,

Verne A. Ord

Assistant Chief – BUSTR
Division of State Fire Marshal
Ohio Department of Commerce

xc:

Site File

Diane Sheridan, City of Barberton Planning Department

## Attachment B

Letters of Support from Community- Based Organizations



## Rotary Club/Foundation of Barberton, Ohio U.S.A.

P.O. Box 572 Barberton, Ohio 44203-0572 USA

January 16, 2014

Mr. Joe Stefan Assistant Planning Director City of Barberton 576 West Park Avenue Barberton, OH 44203

Re: Letter of Commitment for U.S. EPA Brownfield Assessment Grant

Dear Mr. Stefan:

The Rotary Club of Barberton, a local volunteer organization dedicated to providing service in our community, would like to take this opportunity to submit this letter in support of and partnership with the City of Barberton in its effort to secure and implement a grant from the Fiscal Year 2014 U.S. EPA Brownfield Assessment Program.

We are in full support of Barberton's efforts under this grant to identify threats to the environment and public health, preserve and protect greenspace in the community, strengthen public/private partnerships for redevelopment and revitalize our neighborhoods and the economy.

We cannot overstate the value and importance this grant will bring to our community. Eliminating Brownfields and the threat they pose to our quality of life, our health and the environment is integral to the revitalization of Barberton. We will invite the Planning Department staff to speak at meetings over the grant timeframe to educate our members and guests about the benefits and accomplishments of the City's economic development Brownfield program.

Sincerely,

Todd B. Wallace, President
The Rotary Club of Barberton



January 13, 2014

Mr. Joe Stefan Assistant Planning Director City of Barberton 576 West Park Avenue Barberton, OH 44203

Re: Letter of Commitment for U.S. EPA Brownfield Assessment Grant

Dear Mr. Stefan:

On behalf of the **Neighborhood Development Services**, I am pleased to write this letter supporting the City's efforts to secure a \$400,000.00 grant from the 2014 U.S. EPA Brownfield Assessment Program.

Neighborhood Development Services has been dedicated to revitalizing neighborhoods for more than 28 years through: Increasing homeownership, increasing homebuyer awareness & sustainability, creating quality, affordable single-family homes, improving existing housing stock, creating decent and affordable rental housing and creating jobs through small business lending. We are a non-profit, Neighbor Works Chartered Member currently working to make Barberton a better place to live and work.

Neighborhood Development Services understand the impact that brownfields have on property values and our ability to attract and retain high paying employers as well as attract homebuyers and retain the homeowners residing in Barberton. The U.S. EPA Brownfield Grants provide a valuable means to grow our local economy, improve local property values and remove the blighting influence of former abandoned and underutilized industrial sites on our distressed neighborhoods.

Main Office: 120 E. Main Street, Ravenna, Ohio 44266 • (330) 297-6400





This project will serve to improve the standard of living for all Barberton residents and our organization applauds your efforts to serve our community. As a partner in the proposed grant project, we commit to the City the in kind use of our staff, specifically in the areas of public education/outreach, distribution of project information, including space dedicated to brownfield efforts on our web page, social media pages and general advocacy.

We look forward to the award of the requested grant funding and implementation of this project. Please contact me at 330.297.6400 if I can be of further assistance.

Sincerely,

Dave Vaughan, Executive Director

**Neighborhood Development Services** 



## MAGIC CITY KIWANIS P.O. BOX 561 • BARBERTON, OHIO 44203

January 17, 2014

Mr. Joe Stefan Assistant Planning Director City of Barberton 576 West Park Avenue Barberton, OH 44203

Re: Letter of Support for U.S. EPA Brownfield Assessment Grant

Dear Mr. Stefan:

The Magic City Kiwanis, a local volunteer organization dedicated to providing service in our community, submits this letter in support of the City of Barberton in its effort to secure and implement a grant from the Fiscal Year 2014 U.S. EPA Brownfield Assessment Program.

We are in full support of Barberton's efforts under this grant to identify threats to the environment and public health, preserve and protect green space in the community, strengthen public/private partnerships for redevelopment and revitalize our neighborhoods.

Eliminating brownfields and the threat they pose to our quality of life, our health and the environment is integral to the revitalization of Barberton. We will invite the Planning Department staff to speak at meetings over the grant timeframe to educate our members and guests about the benefits and accomplishments of the City's economic development brownfield program.

Should you have any questions please do not hesitate to reach me at 330-745-3358 or email Barbertongirl@neo.rr.com

Sincerely,

Elizabeth B. Wilson

Lighted B. Willem

Secretary

Magic City Kiwanis



# **Barberton City Schools**

...Working to be the school district of choice in this region

Administration Building 479 Norton Avenue Barberton, Ohio 44203 Ph: 330.753.1025 Fax: 330.848.0884

Barberton High School 555 Barber Road Barberton, Ohio 44203 Ph: 330.753.1084 Fax: 330.848.5517

Barberton Middle School 477 Fourth Street NW Barberton, Ohio 44203 Ph: 330.745.9950 Fax: 330.745.9962

Barberton Elementary School East 292 E Robinson Avenue Barberton, Ohio 44203 Ph: 330,745.5492 Fax: 330,745.8378

Barberton Elementary School West 1151 Shannon Avenue Barberton, Ohio 44203 Ph: 330.825.2183 Fax: 330.825.2195

Visit our Website: www.barbertonschools.org January 10, 2014

Mayor William Judge City of Barberton 576 Park Ave. Barberton, Ohio

Re:

Letter of Support for U.S. EPA Brownfield Assessment Grant

Dear Mayor Judge:

I am writing this letter to support the City of Barberton's application for the \$400,000 FY 2014 U.S. EPA Brownfield Assessment Grant. The Barberton Board of Education fully supports this application with the understanding that the grant will support progress toward improved environmental and public health in the City of Barberton. Specifically, we understand that the grant sought will provide funding to assess brownfield sites located community-wide.

As one of the larger public school districts in Summit County and active members of the Barberton community, we strive for our children and their families to have safe, clean places to live and work. We encourage our students to engage in their community and become productive members of society. We understand the value and importance this grant brings to our community and we look forward to the opportunities it may provide to our students.

We understand that our role on the project will be to provide the following in-kind support:

- Site selection and prioritization The City Schools will assist in prioritizing brownfields that may be in the vicinity of the campuses or as part of the gateways into our property.
- Public outreach As project supporters, the City Schools will share the City's brownfields program information with our staff and students
- Meeting facilities As an in-kind contribution to the project, we will help to host a public meeting and provide meeting space.
- Learning lab opportunities Should the City's brownfields program offer an
  interconnection for our environmental science, engineering, journalism or Spanish
  curriculum, clubs or programs, we are hopeful for opportunities where students might
  follow-along or coordinate with project partners for participation opportunities that enrich
  learning.
- Spanish translating assistance As desired, our Spanish Club is offering in-kind support to translate program materials or sit in on public meetings to help connect Spanishspeaking residents.
- Sustainable redevelopment planning The City Schools will aid in sustainable redevelopment planning considerations.

Very truly yours

Patricia Cleary Superintendent

Form #200 Rev 07-2012

Attachment C Documentation of Leveraged Funds



Founded 1891

January 20, 2014

Mayor William Judge City of Barberton 576 Park Ave. Barberton, Ohio 44203

Re:

Letter of Support for U.S. EPA Brownfield Assessment Grant

Dear Mayor Judge:

The City of Barberton is providing this letter as documentation of our commitment to provide in-kind resources in support of the City of Barberton's U.S. EPA Brownfield Assessment grant application and project implementation.

Our Planning Department oversees updates and new plans for land use, zoning, and development. In addition, our staff serves to support the Barberton Planning Commission, as well as the implementation of the City's Comprehensive Plan.

Specifically, we anticipate providing roughly1500 hours of in-kind resources (Director and staff time) over the 3-year implementation period in the areas of:

- Coordination in the qualifications-based selection of an environmental consultant partner
- Coordination with environmental agency representatives
- Assistance in site selection and prioritization of funding
- Communicating with public and private owners who would like to participate
- Aid in programmatic administration (preparation of financial/payment submittals, quarterly reports, progress meetings, preparation and distribution of project information)

The total estimated value of these in-kind services would be approximately \$67,500 (using an average hourly rate of \$45,00).

Please call us if we can provide any additional information.

Very trilly yours,

Ron Mollric Chairman

**Barberton Planning Commission** 

n Molleiz



January 13, 2014

Mayor William Judge City of Barberton 576 Park Ave. Barberton, Ohio

Re: Letter of Support for U.S. EPA Brownfield Assessment Grant

Dear Mayor Judge:

Barberton Community Development Corporation (BCDC) is providing this letter as documentation of our commitment to provide in-kind resources in support the City of Barberton's U.S. EPA Brownfield Assessment grant application and project implementation.

BCDC's primary purpose is to create jobs in the City of Barberton and to provide incentives for business development. We are community development professionals that deal with retaining, financing and pursuing business development in the City. On a routine basis, we understand the impact that brownfields have on property values and how essential it is to work together to attract and retain high paying employers. The U.S. EPA Brownfield Grants provide a valuable means to grow our local economy, improve local property values and remove the blighting influence of former abandoned and underutilized industrial sites on our distressed neighborhoods.

As a partner in the proposed grant project, we commit to the City the in-kind use of our staff, specifically in the areas of public education, distribution of project information, and general advocacy. Our primary role will be to support the City in any way to educate property owners, business owners, development partners, residents and the community on the benefits of the program.

Specifically, BCDC will provide up to 200 hours of in-kind resources (Director and staff time) for:

- marketing the program to local businesses and property owners
- · participating in meetings on site selection and prioritizing funding for redevelopment
- hosting a public workshop on the program for local businesses and potential development partners

The total value of these in-kind services is \$13,126.00 (using an average hourly rate of \$65.63), and may be more based on the 3-year implementation of the grant period.

We look forward to working with the City on this overall initiative.

Sincerely,

Scott Wagner, Director

## Attachment D

Special Considerations or Other Factors Checklist (Appendix 3)

## Appendix 3 Other Factors Checklist

Name of Applicant:	City of Barberton, Ohio	
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Please identify (with an X) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

	Other Factor	Page #
	Community population is 10,000 or less	
	Federally recognized Indian tribe	
	United States territory	
	Applicant will assist a Tribe or territory	
	Targeted brownfield sites are impacted by mine-scarred land	
X	Targeted brownfield sites are contaminated with controlled substances	2
x	Recent natural disaster(s) (2006 or later) occurred within community, causing significant community economic and environmental distress	2
X	Project is primarily focusing on Phase II assessments.	8
х	Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation	8
x	Community experienced manufacturing plant closure(s) (2008 or later) tied to the targeted brownfield sites or project area, including communities experiencing auto plant closures due to bankruptcy or economic disruptions.	4
х	Recent (2008 or later) significant economic disruption ( <u>unrelated</u> to a natural disaster or manufacturing/auto plant closure) has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	4
	Applicant is a recipient or a core partner of a HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant that is directly tied to the project area, and can demonstrate that funding from a PSC grant has or will benefit the project area. To be considered, applicant must attach documentation which demonstrates this connection to a HUD-DOT-EPA PSC grant.	
	Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant	
X	Community is implementing green remediation plans.	12
	Climate Change (also add to "V.D Other Factors")	